

Judge PauleyUNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EXIM GRAIN TRADE B.V.,	:	X	NY 6989
Plaintiff,	:		
- against -	:		08 Civ.
J.K. INTERNATIONAL PTY LTD.,	:		ECF CASE
Defendant.	:	X	

AFFIDAVIT IN SUPPORT OF PRAYER FOR MARITIME ATTACHMENT

State of Connecticut)
) ss: SOUTHPORT
 County of Fairfield)

Lauren C. Davies, being duly sworn, deposes and says:

1. I am a member of the Bar of this Court and represent the Plaintiff herein. I am familiar with the facts of this case and make this Affidavit in support of Plaintiff's prayer for the issuance of a Writ of Maritime Attachment and Garnishment, pursuant to Rule B of the Supplemental Admiralty Rules of the Federal Rules of Civil Procedure.

THE DEFENDANT IS NOT WITHIN THIS DISTRICT

2. I have attempted to locate the Defendant, J.K. INTERNATIONAL PTY LTD., within this District. As part of my investigation to locate the Defendant within this District, I checked the telephone company information directory all area codes within the District, as well as the white and yellow pages for New York listed on the Internet or World Wide Web, and did not find a listing for the Defendant. I also checked the New York State Department of Corporations' online database, which showed no listing or registration for the Defendant, however, two listings for J.K. International were discovered. The first listing, J.K. International,

Inc., is a domestic corporation, which does not appear to be the Defendant herein. The second listing, J.K. International Trading, is also a domestic corporation and does not appear to be the Defendant herein. *See attached as Exhibit 1.* I was also unable to find any information to indicate that the Defendant has a general or managing agent within the District.

4. I submit that Defendant cannot be found within this District within the meaning of Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims.

5. Upon information and belief, the Defendant has, or will have during the pendency of this action, tangible and intangible property within the District subject to the jurisdiction of this Court.

PRAYER FOR RELIEF FOR AN ORDER ALLOWING SPECIAL PROCESS SERVER

6. Plaintiff seeks an Order, pursuant to Rule 4(c) of the Federal Rules of Civil Procedure, appointing Thomas L. Tisdale, Claurisse Campanale-Orozco, Lauren C. Davies, or any other partner, associate, paralegal or agent of Tisdale Law Offices, to serve the Verified Complaint, Process of Maritime Attachment and Garnishment, Interrogatories or other process in this action upon the garnishee(s) who, based upon information and belief may hold assets of, for or on account of the Defendant.

7. Plaintiff seeks this Order to serve the Process of Maritime Attachment and Garnishment will deliberate speed in order to fully protect itself against the potential of being unable to satisfy any judgment or award obtained by Plaintiff against Defendants.

8. To the extent that Plaintiff's Application for an Order appointing a special process server does not involve the restraint of physical property, service does not need to be effected by the Marshal's Office. Service sought to be carried out by Plaintiff is the delivery of the Process of Maritime Attachment and Garnishment to the various garnissees identified in the writ.

PRAYER FOR RELIEF TO SERVE LATER IDENTIFIED GARNISHEES

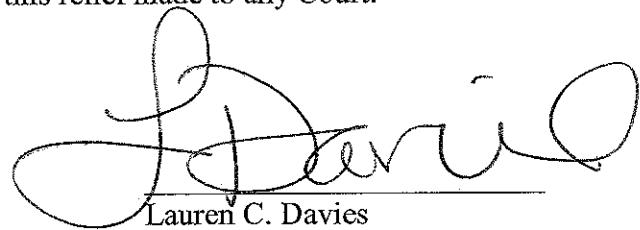
9. Plaintiff further requests that this Court grant it leave to serve any additional garnishee(s) who may, upon information and belief, obtained in the course of this litigation, to be holding or believed to be holding, property of the Defendants, within this District. Obtaining leave of Court at this time to serve any later identified garnishee(s) will allow for prompt service of the Writ of Maritime Attachment and Garnishment without the need to present to the Court amended Process to add future identified garnishee(s).

PRAYER FOR RELIEF TO DEEM SERVICE CONTINUOUS

10. Plaintiff also respectfully requests that the Court grant it leave, as set out in the accompanying Ex Parte Order for Process of Maritime Attachment, for any process that is served on a garnishee to be deemed effective and continuous service of process throughout any given day on which process is served through the next day, provided that process is served the next day, to authorize service of process via facsimile or e-mail following initial *in personam* service.

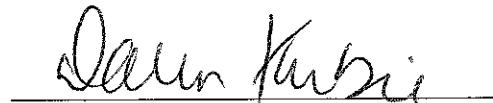
11. This is Plaintiff's first request for this relief made to any Court.

Dated: August 5, 2008
Southport, CT



Lauren C. Davies

Sworn and subscribed to before me
this 5th day of August 2008.



Karen Kubis
Notary Public

EXHIBIT 1

NYS Department of State

Division of Corporations

Entity Information

Selected Entity Name: J.K. INTERNATIONAL TRADING, INC.

Selected Entity Status Information

Current Entity Name: J.K. INTERNATIONAL TRADING, INC.

Initial DOS Filing Date: MARCH 28, 1984

County: NEW YORK

Jurisdiction: NEW YORK

Entity Type: DOMESTIC BUSINESS CORPORATION

Current Entity Status: INACTIVE

Selected Entity Address Information

DOS Process (Address to which DOS will mail process if accepted on behalf of the entity)

J.K. INTERNATIONAL TRADING, INC.

56 WEST 39TH ST.

NEW YORK, NEW YORK, 10018

Registered Agent

NONE

NOTE: New York State does not issue organizational identification numbers.

[Search Results](#)

[New Search](#)

[Division of Corporations, State Records and UCC Home Page](#) [NYS Department of State Home Page](#)

NYS Department of State

Division of Corporations

Entity Information

Selected Entity Name: J.K. INTERNATIONAL INC.

Selected Entity Status Information

Current Entity Name: J.K. INTERNATIONAL INC.

Initial DOS Filing Date: SEPTEMBER 11, 1992

County: NASSAU

Jurisdiction: NEW YORK

Entity Type: DOMESTIC BUSINESS CORPORATION

Current Entity Status: ACTIVE

Selected Entity Address Information

DOS Process (Address to which DOS will mail process if accepted on behalf of the entity)

J.K. INTERNATIONAL INC.
26 BROADWAY
STE 748
NEW YORK, NEW YORK, 10004

Chairman or Chief Executive Officer

JITENDRA ZAVERI
44 LAKE DRIVE
NEW HYDE PARK, NEW YORK, 11040

Principal Executive Office

J.K. INTERNATIONAL INC.
26 BROADWAY
STE 748
NEW YORK, NEW YORK, 10004

Registered Agent

NONE

NOTE: New York State does not issue organizational identification numbers.

[Search Results](#)

[New Search](#)

[Division of Corporations, State Records and UCC Home Page](#) [NYS Department of State Home Page](#)